

LAW OFFICES  
DAVID S. GREENFIELD  
100 LAFAYETTE STREET • SUITE 502 NEW YORK, N.Y. 10013  
(212) 481-9350  
TELECOPIER (212) 571-5507

June 9, 2023

**VIA ECF**

Hon. J. Paul Oetken  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Noel Sanabria, 21-cr-313 (JPO)**

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria. I write to respectfully request a modification to Mr. Sanabria's bail conditions. Specifically, I write to request the Court remove the condition of home detention and replace it with a curfew, as discussed below. Pre-Trial Services has indicated that it has no objection to this request, and the government has informed me that it defers to Pre-Trial Services.

On May 31, 2023, the Court sentenced Mr. Sanabria to one year and one day imprisonment. Mr. Sanabria is scheduled to surrender on July 17, 2023.

I write to request that the Court remove the condition of home detention and instead impose a curfew of 7am to 10pm, with the location monitoring to remain in place. This will allow Mr. Sanabria to put his affairs in order prior to his incarceration. In addition to continuing to work full-time, Mr. Sanabria would like to see several doctors, a dentist, as well as surrender his license plates to the DMV and return his cable box, so as not to incur expenses he cannot pay while he is incarcerated. He also would like to spend some time with his mother and other family members, and also be able to take his mother to the cemetery in New Jersey to visit his brother's gravesite.

Accordingly, Mr. Sanabria respectfully requests that the Court modify his conditions of release, remove the condition of home detention and grant him a curfew from 7am to 10pm, with location monitoring, until his surrender date on July 17, 2023.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)  
Pre-Trial Services Officer Viosanny Harrison (via email)

Granted. The condition of home detention is hereby removed and replaced with the condition of curfew from 10:00 pm to 7:00 am, with location monitoring.  
So ordered.  
6/12/2023



J. PAUL OETKEN  
United States District Judge